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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY; WISHTOYO
FOUNDATION,

Plaintiffs,

v.

DOUG BURGUM, et al.,

Federal Defendants

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

)
)
)
) Case No. 2:24-cv-05459-MWC-
) MAA

)
) **FEDERAL DEFENDANTS'**
) **NOTICE OF RECENT**
) **DEVELOPMENTS**

)
) Honorable Michelle Williams
) Court
) United States District Judge

1 In an abundance of caution, Federal Defendants respectfully submit this
2 notice to inform the Court of certain statements in prior filings that, based on
3 recent events, may no longer be accurate.

4 On May 19, 2025, the undersigned counsel learned that Sable had restarted
5 production at the Santa Ynez Unit. At this time, the Bureau of Safety and
6 Environmental Enforcement (“BSEE”) has not received notice from the California
7 State Fire Marshal Office’s Pipeline Division that Sable is approved to operate the
8 onshore pipeline segments 901/903.¹ Federal Defendants understand that Sable is
9 now producing to onshore storage tanks at the Las Flores Canyon facility, but it is
10 not currently producing to pipeline segments 901/903.

11 This is relevant because, on December 20, 2024, Federal Defendants filed
12 the Declaration of Bruce Hesson, which stated that, “before returning to
13 production, . . . the California State Fire Marshal[] Office’s Pipeline Division must
14 inform BSEE that Sable is approved to operate the onshore pipeline segments
15 901/903, which have been inoperable since 2015.” ECF No. 37-1 at ¶ 14.
16 Consistent with that declaration, Federal Defendants represented in their motion
17 for voluntary remand that “Sable still needs approval from the California State Fire
18 Marshal[] Office’s Pipeline Division to operate the onshore pipeline or else
19 establish some other means of transporting any oil and gas produced at the Unit.”
20 ECF No. 37 at 16. Finally, Federal Defendants’ reply in support of the motion for
21 voluntary remand stated that there were “several hurdles for Sable to overcome
22 before it can resume production of oil and gas at the Santa Ynez Unit,” including
23 obtaining “final approval of Sable’s startup plan” from the Office of the State Fire
24

25 ¹ Sable’s press release associated with the restart can be found here:
26 [https://sableoffshore.com/news/news-details/2025/Sable-Offshore-Corp--Reports-](https://sableoffshore.com/news/news-details/2025/Sable-Offshore-Corp--Reports-Restart-of-Oil-Production-at-the-Santa-Ynez-Unit-and-Anticipated-Oil-Sales-from-the-Las-Flores-Pipeline-System-in-July-2025/default.aspx)
27 [Restart-of-Oil-Production-at-the-Santa-Ynez-Unit-and-Anticipated-Oil-Sales-](https://sableoffshore.com/news/news-details/2025/Sable-Offshore-Corp--Reports-Restart-of-Oil-Production-at-the-Santa-Ynez-Unit-and-Anticipated-Oil-Sales-from-the-Las-Flores-Pipeline-System-in-July-2025/default.aspx)
[from-the-Las-Flores-Pipeline-System-in-July-2025/default.aspx](https://sableoffshore.com/news/news-details/2025/Sable-Offshore-Corp--Reports-Restart-of-Oil-Production-at-the-Santa-Ynez-Unit-and-Anticipated-Oil-Sales-from-the-Las-Flores-Pipeline-System-in-July-2025/default.aspx).

1 Marshal (“OSFM”). ECF No. 60 at 6.

2 Federal Defendants will continue to gather information and will update the
3 Court.

4
5 Respectfully submitted this 23rd day of May, 2025.

6
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